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*Local Counsel for Defendant Trans Union, LLC*

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON (SEATTLE)**

KEIKO HARADA,  
Plaintiff,

vs.

COMCAST CABLE COMMUNICATIONS,  
LLC, a Delaware Corporation; TRANS  
UNION LLC, a Delaware Limited  
Liability Company; and SOUTHWEST  
CREDIT SYSTEMS, LP;  
Defendants.

CASE NO.

**TRANS UNION, LLC'S NOTICE OF  
REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("Trans Union") hereby removes the subject action from the King County Superior Court, State of Washington to the United States District Court for the Western District of Washington (Seattle), on the following grounds:

1. Plaintiff Keiko Harada served Trans Union on or about July 27, 2022, with a Summons and Complaint. Copies of the Summons and Complaint are attached hereto as **Exhibit A** and **Exhibit B**.

2. In the Complaint, Plaintiff makes claims against Trans Union under the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the "FCRA"). See Complaint ¶¶ 8.2-8.17, 9.2-9.6 and 10.2-10.6.

**TRANS UNION, LLC'S NOTICE OF REMOVAL  
1 – Case No.**

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1           3. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C.  
2 § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus  
3 supplies this federal question.

4           4. Pursuant to 28 U.S.C. § 1441, *et seq.*, this cause may be removed from the King  
5 County Superior Court, State of Washington to the United States District Court for the Western  
6 District of Washington (Seattle).

7           5. As of the date of this Notice Of Removal, Defendant Comcast Cable Communications,  
8 LLC (“Comcast”) has been served. Counsel for Trans Union has contacted counsel for Comcast  
9 who has consented to this removal as evidenced by the consent attached hereto as **Exhibit C**. As  
10 of the date of this Notice Of Removal, Defendant Southwest Credit Systems, LP (“Southwest  
11 Credit”) have not been served.

12           6. Notice of this removal will promptly be filed with the King County Superior Court,  
13 State of Washington and served upon all adverse parties.

14           WHEREFORE, Defendant Trans Union, LLC, by counsel, removes the subject action from  
15 the King County Superior Court, State of Washington to this United States District Court,  
16 Western District of Washington (Seattle).

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20           Respectfully submitted,

21           RANALLO LAW OFFICE

22  
23           s/ Nicholas Ranallo

24           Nicholas Ranallo, Esq.  
25           WA State Bar No. 51439

26           *Local Counsel for Defendant Trans Union,  
          LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been filed electronically on the **5<sup>th</sup> day of August, 2022**. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

None.	
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The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on the **5<sup>th</sup> day of August, 2022**, properly addressed as follows:

<b><u>for Plaintiff Keiko Harada</u></b> Robert Mitchell, Esq. Robert Mitchell, Attorney at Law 1020 N. Washington Spokane, WA 99201 bobmitchelllaw@gmail.com	
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*s/ Nicholas Ranallo* \_\_\_\_\_

Nicholas Ranallo, Esq.

WA State Bar No. 51439

*Local Counsel for Defendant Trans Union, LLC*